

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

PATRICK DONNELLY, individually and on	:	
Behalf of a class of similarly situated persons and	:	
entities,	:	
	:	CIVIL ACTION NO.:
Plaintiff	:	2:12-cv-07629-ES-SCM
	:	
versus	:	
	:	
NEW JERSEY RE-INSURANCE COMPANY;	:	
ASSURANT INSURANCE GROUP (d/b/a	:	
American Bankers Insurance Company of Florida);	:	
FIDELITY NATIONAL PROPERTY &	:	
CASUALTY INSURANCE COMPANY (also	:	
d/b/a Fidelity National Property & Casualty	:	
Insurance Company); HARTFORD FIRE	:	
INSURANCE COMPANY; LIBERTY MUTUAL	:	
FIRE INSURANCE COMPANY; SELECTIVE	:	
INSURANCE COMPANY OF AMERICA;	:	
PHILADELPHIA CONTRIBUTIONSHIP	:	
INSURANCE COMPANY; STATE FARM FIRE	:	
AND CASUALTY COMPANY; TRAVELERS	:	
INSURANCE COMPANIES (d/b/a Standard	:	
Fire Insurance Company); and ABC INSURANCE	:	
COMPANIES 1-10 (being fictitious names)	:	
	:	
Defendants.	:	

**CONSENT APPLICATION OF DEFENDANTS  
NEW JERSEY RE-INSURANCE COMPANY, ASSURANT INSURANCE  
GROUP (d/b/a American Bankers Insurance Company of Florida), FIDELITY  
NATIONAL PROPERTY & CASUALTY INSURANCE COMPANY (also d/b/a  
Fidelity National Property & Casualty Insurance Company); HARTFORD FIRE  
INSURANCE COMPANYSELECTIVE INSURANCE COMPANY OF AMERICA, and  
PHILADELPHIA CONTRIBUTIONSHIP INSURANCE COMPANY  
FOR PRO HAC VICE ADMISION OF GERALD J. NIELSEN**

PLEASE TAKE NOTICE that the firm of McMahon, Martine & Gallagher LLP, the attorneys of record for Defendants NEW JERSEY RE-INSURANCE COMPANY, ASSURANT

INSURANCE GROUP (d/b/a American Bankers Insurance Company of Florida), FIDELITY NATIONAL PROPERTY & CASUALTY INSURANCE COMPANY (also d/b/a Fidelity National Property & Casualty Insurance Company); HARTFORD FIRE INSURANCE COMPANY, SELECTIVE INSURANCE COMPANY OF AMERICA, and PHILADELPHIA CONTRIBUTIONSHIP INSURANCE COMPANY in this action, respectfully make application to this Court, **on consent** of Plaintiff's counsel, for the entry of an Order admitting Gerald J. Nielsen *Pro Hac Vice*;

PLEASE TAKE FURTHER NOTICE that in support of this Motion, the Defendants shall rely on the Consent of Designated Local Counsel and the Application for Admission *Pro Hac Vice* of Gerald J. Nielsen submitted herewith;

This 21<sup>st</sup> day of March, 2013.

BY: /s/ Patrick W. Brophy  
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Local Counsel for Defendants NEW JERSEY RE-INSURANCE COMPANY, ASSURANT INSURANCE GROUP (d/b/a American Bankers Insurance Company of Florida), FIDELITY NATIONAL PROPERTY & CASUALTY INSURANCE COMPANY (also d/b/a Fidelity National Property & Casualty Insurance Company); HARTFORD FIRE INSURANCE COMPANY, SELECTIVE INSURANCE COMPANY OF AMERICA, and PHILADELPHIA CONTRIBUTIONSHIP INSURANCE COMPANY